

MEMORANDUM ENDORSED

LAW OFFICE OF AMY JANE AGNEW, P.C.

Honorable Kenneth M. Karas
United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

March 15, 2023

VIA ECF

Re: Ceara v. Deacon, 13-cv-6023
Request to Lift Stay

Dear Judge Karas:

I write in furtherance of the stay of proceedings granted by this Court on December 27, 2020. The circumstances that necessitated Plaintiff's application for a stay no longer exist. Plaintiff respectfully requests that the case be returned to the active docket and thanks the Court and defendants for their courtesy.

Unfortunately, the parties are in the same position when last we met with the Court: Defendants have extended a settlement offer Plaintiff is willing to accept, however, it is conditioned on Mr. Ceara's full release of all other claims he may have against employees from the State of New York – a condition he cannot accept. As discussed, Mr. Ceara would be willing to accept the settlement on the same terms that the State would gain after judgment – a full release of all claims raised in the litigation.

Very truly yours,

Granted.

/s/ Amy Jane Agnew

The Court will hold a status conference on
4/19/23, at 12:00

Amy Jane Agnew, Esq.

So Ordered

4/4/23